

## REMARKS

Claims 1-4 and 6-13 are pending herein.

### I. Allowed claims 8-10.

Applicants respectfully thank the Examiner for indicating allowed claims 8-10.

### II. The obviousness rejection of claim 1.

The USPTO respectfully rejects claim 1 under 35 U.S.C. § 103(a) as being obvious over Admission in view of Ylitalo et al. (US 6543890 B1).

A. The cited references do not teach or suggest a protection member capable of being placed between the light source and the recording medium when the media error is detected, as claimed in claim 1.

Regarding the limitations of claim 1 that claim in relevant part:

a protection member capable of being placed between the light source and the recording medium **when the media error is detected . . . (emphasis added)**

it is respectfully not seen where the cited references teach or suggest the claimed structure.

Specifically, present Figure 4 illustrates one embodiment of the claimed structure quoted above. As described at pages 17-18 of the present specification, media error detection mechanism 10 detects media errors such as jams. **When a media error is detected, the media error detection mechanism 10 sends a media error signal to control device 21. Upon detecting a media error, the control device 21 activates motor 17.** As shown in Present Figures 3A-3B, and described at pages 16-17 of the present specification, **motor 17 drives rotation axis 23, placing protection member 18 between light sources 11 and recording medium P.** Thus, the protection member is structured to be capable of being placed between the light source and the recording medium when the media error is detected, as claimed in claim 1.

The claimed structure quoted above is important because a media error such as a jam can cause the recording medium to contact the light sources or recording heads. Placing a

protection member between the light source and the recording medium when a media error is detected helps to prevent damage to the printing equipment (see pages 2-3, 25 of the present specification).

In contrast, applicants respectfully assert that Ylitalo does not teach or suggest a detection member that is placed between a light source and a recording medium when a media error is detected. As the USPTO notes on page 4 of the Office Action, Ylitalo teaches a shield 20 that is capable of being placed between a light source and the recording medium.

However, Ylitalo does not teach that a protection member is capable of being placed between a light source and a recording medium when a media error is detected, as claimed in claim 1.

Specifically, as seen in Ylitalo Figures 1 and 2, Ylitalo appears to teach that a shield 20 is capable of being placed between lamp 17 and substrate 12 to control the curing time and radiation exposure of ink on the substrate (see also Ylitalo column 5, lines 43-49). **However, the placement of the shield in Ylitalo does not appear to be controlled by a media error signal. In fact, Ylitalo does not appear to teach that a media error can be detected.** In addition to shield 20, Ylitalo Figure 4 shows additional barrier 34b. However, Figure 4 does not teach the claimed structure quoted above because barrier 34b is stationary and cannot be placed when a media error is detected (see Ylitalo column 7, lines 3-4). Therefore, Ylitalo cannot teach or suggest a protection member capable of being placed between a light source and a recording medium **when a media error is detected**, as claimed in claim 1.

Thus, it is respectfully asserted that the cited references, either alone or in combination, do not teach or suggest the claimed structure quoted above. Therefore, it is respectfully asserted that claim 1 is not obvious over Admission in view of Ylitalo.

**B. The cited references do not teach or suggest a protection member placed between a recording head and a recording medium, as claimed in claim 1.**

Regarding the limitations of claim 1 that claim in relevant part:

the protection member is further placed **between the recording head and the recording medium. (emphasis added)**

it is respectfully not seen where the cited references teach or suggest the claimed structure.

Specifically, present Figure 6b illustrates one example of the claimed structure quoted

above. As described in pages 22-24 of the present specification, protection member 18 is placed between recording heads 4 and the recording medium P. As noted above, this structure helps to prevent damage to the printing equipment when a media error is detected.

In contrast, applicants respectfully assert that Ylitalo does not teach or suggest a protection member placed between a recording head and a recording medium. As the USPTO notes on page 4 of the Office Action, Ylitalo Figure 1 teaches a shield 20, a print head 11, and a substrate 12. However, applicants respectfully assert that, as shown in the figures and described in the specification, Ylitalo does not teach that the shield 20 is placed between recording head 11 and substrate 12.

Specifically, as best seen in Ylitalo Figures 1 and 2, shield 20 is cylindrical in shape, and surrounds lamp 17 (see also Ylitalo column 5, lines 1-9). Figure 1 shows that print head 11 is exterior to the cylindrical shield 20. Therefore, shield 20 is not placed between print head 11 and substrate 12. Because shield 20 is not placed between print head 11 and substrate 12, Ylitalo does not teach or suggest a protection member placed between a recording head and a recording medium, as claimed in claim 1.

Thus, it is respectfully asserted that the cited references do not teach or suggest the claimed structure quoted above. Therefore, it is respectfully asserted that claim 1 is not obvious over Admission in view of Ylitalo.

### III. The dependent claims.

As noted above, it is respectfully asserted that independent claim 1 is allowable. Therefore, it is further respectfully asserted that dependent claims 2-4, 6-7, and 11-13 are allowable.

IV. Conclusion.

Reconsideration and allowance of all of the claims is respectfully requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Please contact the undersigned for any reason. Applicants seek to cooperate with the Examiner including via telephone if convenient for the Examiner.

Respectfully submitted,

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\* above is an S SIGNATURE  
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